

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Red Tree Investments, LLC

Plaintiff	Case Number
vs.	1:19-cv-02523
PDVSA Petroleos, S.A., Petroleo De Venezuela, S.A.	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Red Tree Investments, LLC

Plaintiff	Case Number
vs.	1:19-cv-02519
PDVSA Petroleos, S.A., Petroleo De Venezuela, S.A.	
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

Notice of removal filed on 3-21-19 (no judge has been assigned)

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Pursuant to Rule 13 for the Division of Business Among District Judges for the Southern District, cases shall be deemed "related" where the "interests of justice and efficiency will be served." "In determining relatedness, a judge will consider whether (A) the actions concern the same or substantially similar parties, property, transactions or events; (B) there is substantial factual overlap; (C) the parties could be subjected to conflicting orders; and (D) whether absent a determination of relatedness there would be a substantial duplication of effort and expense, delay, or undue burden on the Court, parties or witnesses." The cases here meet this standard.

The cases involve the same parties (represented by the same law firms, respectively), and were commenced in the Supreme Court of the State of New York on February 15, 2019, and removed to this Court on March 21, 2019, and involve transactions with the same or related non-parties.

Signature: /s/ Robin L. Muir Date: 3/21/2019

Hogan Lovells US LLP

Firm: _____